

To: CN=Steve Vandegrift/OU=ADA/O=USEPA/C=US@EPA[]
Cc: CN=Lauren Drees/OU=CI/O=USEPA/C=US@EPA[]
From: CN=Holly Ferguson/OU=CI/O=USEPA/C=US
Sent: Wed 8/8/2012 5:45:22 PM
Subject: Fw: REGION 12 | CASE 42753 | LAB CHEM | SDG MULTIPLE | ISSUE CCS SUPPORT | FINAL
<mailto:cjose2@fedcsc.com>
Zhaleh@chemtech.net
feranda.jennifer@epa.gov
cjose2@fedcsc.com
www.csc.com
[\[mailto:Himanshu@chemtech.net\]](mailto:Himanshu@chemtech.net)
Zhaleh@chemtech.net
<mailto:cjose2@fedcsc.com>
cjose2@fedcsc.com
www.csc.com

Steve, FYI in case Rick has questions regarding upcoming corrections he might see regarding the Pavillion data set. Essentially, all of the Form 6 reports for duplicates will need to be revised by Chemtech, but it won't change which metals are to be flagged with J6. It is still Cr, Pb, and Ni.

Thank you,
 Holly Ferguson, QA Manager
 Environmental Technology Assessment, Verification and Outcomes Staff
 NRMRL/ORD/USEPA
 513-569-7944

----- Forwarded by Holly Ferguson/CI/USEPA/US on 08/08/2012 01:41 PM -----

From: "Jose, Christian" <cjose2@fedcsc.com>
To: "Himanshu Prajapati" <Himanshu@chemtech.net>, "Divya Mehta" <divya@chemtech.net>, <Zhaleh@chemtech.net>
Cc: MichaelS Johnson/DC/USEPA/US@EPA, "Mayo, Alfred" <amayo@fedcsc.com>, Holly Ferguson/CI/USEPA/US@EPA
Date: 08/08/2012 01:15 PM
Subject: REGION 12 | CASE 42753 | LAB CHEM | SDG MULTIPLE | ISSUE CCS SUPPORT | FINAL

ChemTech,

Thank you for your responses thus far regarding reporting issues in SDGs under Case 42753. However, upon further review by Region and SMO, the following three additional issues were also found.

- For SDG MH3BQ1, the Form 6 needs to be corrected for the following issue. The laboratory is missing the Q qualifier for Cr, Pb, and Ni where the absolute difference between the Sample and the Duplicate exceeds the CRQL control limit. In addition, the Form 1s will need to be corrected to accurately report the Q qualifier for those analytes.

- For all three SDGs (MH3BQ1, MH3BP4, MH3BM4), as per the MA, the laboratory should have reported "all corrections applied to the data to handle interferences and used to generate the final corrected instrument result" somewhere in the data package. We have not been able to locate this information. Please provide the location if the data is present, or provide the required data if it was not originally included in the data package.

- For all three SDGs (MH3BQ1, MH3BP4, MH3BM4), the C qualifiers for the Sample result on Form

6 are incorrect. Results between the MDL and the CRQL are not reported with the "J" qualifier.

Please make the appropriate corrections and resubmit the hardcopy as "additional data" to both the Region and SMO. In addition, please also upload the pdf copy of the corrected hardcopy via EXES as "additional data".

Please make all necessary adjustments at the lab in order to avoid these same issues in future SDGs. Your cooperation is appreciated. Thank you.

Please feel free to contact me if you have any questions,

CHRISTIAN JOSE
Senior Data Assessment Environmental Coordinator
CSC

15000 Conference Center Dr, Chantilly VA 20151
NPS | t: 703-818-4302 | f: 703-818-4601 | cjose2@fedcsc.com | www.csc.com

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From: Himanshu Prajapati [<mailto:Himanshu@chemtech.net>]
Sent: Wednesday, August 08, 2012 12:42 PM
To: Jose, Christian
Cc: Divya Mehta; Zhaleh@chemtech.net
Subject: RE: REGION 12 | CASE 42753 | LAB CHEM | SDG MULTIPLE | ISSUE CCS SUPPORT | FINAL

Hello Christian,

Please see attached corrected Form 6-IN for SDGs (MH3BP4 & MH3BM4) for your reference.
Lab will submit corrected Hard Copy Forms to Region and SMO. Corrected Hard Copy PDF and EDD will be submitted as "Additional Data" on SMO portal.

Please let me know if you have any further questions.

Thank you,

Himanshu Prajapati
QA Coordinator
Direct Line: (908)728-3154
General Number: (908)789-8900
Fax: (908)789-8922

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From: Jose, Christian [mailto:cjose2@fedcsc.com]
 Sent: Wednesday, August 08, 2012 8:41 AM
 To: Himanshu Prajapati; Divya Mehta; Zhaleh@chemtech.net
 Cc: feranda.jennifer@epa.gov
 Subject: REGION 12 | CASE 42753 | LAB CHEM | SDG MULTIPLE | ISSUE CCS SUPPORT | FINAL

Himanshu/ChemTech,

Thank you for your response below regarding the RPD reporting issue in SDG MH3BQ1. However, please note that the same issue was found in SDGs MH3BP4 and MH3BM4 under Case 42753. Please apply the same corrective action to these SDGs as well (SDG MH3BP4 & MH3BM4).

In addition, please make sure to apply all necessary adjustments on your end in order to prevent this issue in future SDGs. Your cooperation and response are greatly appreciated. Thank you.

Please feel free to contact me if you have any questions,

CHRISTIAN JOSE
 Senior Data Assessment Environmental Coordinator
 CSC

15000 Conference Center Dr, Chantilly VA 20151
 NPS | t: 703-818-4302 | f: 703-818-4601 | cjose2@fedcsc.com | www.csc.com

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From: Himanshu Prajapati [mailto:Himanshu@chemtech.net]
 Sent: Tuesday, August 07, 2012 5:51 PM
 To: Jose, Christian
 Cc: Divya Mehta; Zhaleh@chemtech.net
 Subject: RE: REGION 12 | CASE 42753 | LAB CHEM | SDG MH3BQ1 | ISSUE CCS SUPPORT |

Hello Christian,

We have checked calculation for RPD in our reporting software and found out that for "Ni" reporting software has used negative absorbance (raw result) as -2.081 instead of "0" value for sample result. Therefor RPD for "Ni" calculated as 312 instead of 200. Please see below detail calculation for RPD for "Ni".

$$\begin{aligned}
 \text{RPD} &= \left[\frac{[D-S]}{[(D+S)/2]} \right] * 100 \\
 &= \left[\frac{[9.5260 - (-2.081)]}{[(9.5260 + (-2.081))/2]} \right] * 100 \\
 &= \left[\frac{[11.607]}{[3.7225]} \right] * 100 \\
 &= 312
 \end{aligned}$$

For Sb & As, RPD should not be calculated according to EPA SOW ISM01.3 Exhibit D Section 12, 12.7.4 (If both sample and duplicate values are less than the CRQL, the RPD is not calculated). Due to software error lab has reported RPD value as "0". RPD column should be "Blank" for Sb & As due to less than CRQL results for sample and duplicate.

RPD correction for "Ni" will remove "*" flag from Form 6 and therefor Form 1 will be corrected for "Ni" for "*" flag as well. We are going to correct Form 6 for Sb, As and Ni and Form 1 for "Ni" qualifier flag and will send to region as well as SMO. Revised Hard Copy PDF & corrected EDD will be submitted as "Additional Data" on SMO portal.

Please see attached corrected Form 6 and Form 1 for your reference. Please let me know if you have any further questions.

Thank you,

Himanshu Prajapati
QA Coordinator
Direct Line: (908)728-3154
General Number: (908)789-8900
Fax: (908)789-8922

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From: Jose, Christian [mailto:cjose2@fedcsc.com]
Sent: Tuesday, August 07, 2012 9:32 AM
To: CHEM: Divya Mehta; CHEM: Himanshu Prajapati; CHEM: Snehal Mehta
Subject: REGION 12 | CASE 42753 | LAB CHEM | SDG MH3BQ1 | ISSUE CCS SUPPORT |

ChemTech,

Regarding the lab's deliverables for SDG MH3BQ1 under Case 42753, the following discrepancy was found:

The RPDs reported by the laboratory for Sb, As, and Ni appear to be incorrect based on the analysis results reported. The analysis results reported agree with the raw instrument data, and the analysis results reported on the hardcopy data summary forms agree with the results submitted in the Electronic Data Deliverable. An explanation from the laboratory is required on how it calculated an RPD not equal to 200 when one of the values is reported as a non-detect and the other is reported as a detect.

Please provide information regarding this issue. Your immediate response is appreciated. Thank you.

Please feel free to contact me if you have any questions,

CHRISTIAN JOSE
Senior Data Assessment Environmental Coordinator
CSC

15000 Conference Center Dr, Chantilly VA 20151
NPS | t: 703-818-4302 | f: 703-818-4601 | cjose2@fedcsc.com | www.csc.com

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